

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

JULIAN NETTLES-BEY,

Plaintiff,

v.

CARS COLLISION CENTER, LLC; TIMOTHY CHARLES
LAPP; P. WILLIAMS, B. BURKE; TONY KULCYZK,
UNKNOWN TOW TRUCK DRIVER
Defendants.

No. 11-CV-8022

Judge Gottschall

MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE PLEAD

Defendants Timothy Charles Lapp, P Williams, and B. Burke, move this Court
for a 30-day extension of time to answer or otherwise plead:

1. According to the Court docket, the answer for Defendants Lapp, Williams,
and Burke is due on January 18, 2012.

2. The undersigned just received the defense of this case on January 13, 2012.

3. The undersigned begins a trial in Wheaton on January 17, 2012 in
Podschwit v. City of West Chicago, 08-L467, which is expected to last 5-8 days, and has
spent the majority of time since the assignment of this case preparing for that trial.

4. In addition, the undersigned is presenting oral argument in an en-banc
rehearing before the Seventh Circuit Court of Appeals in *Senne v. Palatine*, 10-3243 (7th
Cir.), on Thursday, February 9, 2012.

5. The undersigned has a trial scheduled before Judge Shadur in *Peters v.*
City of Chicago, 09-C-4204 on Monday, February 13, 2012.

WHEREFORE, Defendants request a 30-day extension of time until February 18, 2012, to answer or otherwise plead.

Respectfully submitted,

/s/Brandon K. Lemley

Attorney Timothy Charles Lapp, P Williams,
and B. Burke

Brandon Lemley
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CERTIFICATE OF SERVICE

The undersigned attorney certifies that on Saturday January 14, 2012, the foregoing document was served, pursuant to L.R. 5.9 and the General Order on Electronic Filing, via the Court's Electronic Case Filing System, to all parties of record, and on Tuesday, January 17, 2012 (due to limited mail delivery during the Martin Luther King Jr. holiday) by first class mail to the pro se Plaintiff:

Julian Nettles-Bey
9620 S. Sangamon
Chicago, IL 60643

/s/ Brandon K. Lemley